

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
vs.) Case No. 15-00333-01-CR-W-GAF
)
)
TIMOTHY K. JOKUBEIT,)
)
Defendant.)

MOTION TO CONTINUE SENTENCING

COMES NOW the defendant, Timothy K. Jokubeit, by and through his counsel, Robert Kuchar, Assistant Federal Public Defender for the Western District of Missouri, and moves this Court continue the sentencing hearing until after March 13, 2017. The sentencing hearing is currently set for January 23, 2017.

SUGGESTIONS IN SUPPORT OF MOTION FOR CONTINUANCE

1. On October 13, 2015, defendant was charged in a three count indictment with violations of 18 U.S.C. §§ 2252(a)(2), and (a)(4).
2. On October 27, 2015, the office of the Federal Public Defender was appointed to represent defendant.
3. On May 24, 2016, defendant pled guilty to counts one, and three of the indictment.
4. Defendant is awaiting a mental health exam and is therefore requesting the sentencing be continued until that exam can be completed.
5. David Barnes, Assistant United States Attorney, has no objection to this continuance request.

WHEREFORE, the defendant, Timothy K. Jokubeit, respectfully requests this Court continue the sentencing hearing until after March 13, 2017.

Respectfully submitted,

/s/ Robert Kuchar
Robert Kuchar
Assistant Federal Public Defender
818 Grand, Suite 300
Kansas City, MO 64106
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CERTIFICATE OF SERVICE

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that a copy of the foregoing was electronically delivered to David Barnes, Assistant U.S. Attorney, Western District of Missouri, 400 E. 9th Street, 5th Floor, Kansas City, Missouri, 64106 on this 19th day January, 2017.

/s/ Robert Kuchar
Robert Kuchar